

#### ARIZONA DEPARTMENT OF ECONOMIC SECURITY

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Janet Napolitano Governor David Berns Director

October 17, 2006

# **WIA GUIDANCE LETTER #03-06, CHANGE 1**

THIS WIA GUIDANCE LETTER SUPERSEDES WIA GUIDANCE LETTER #10-02-CHANGE 1, DATED JULY 19, 2004 & WIA GUIDANCE LETTER 03-06, DATED FEBRUARY 27, 2006

SUBJECT: Clarification of Documentation Related to WIA Title IB Eligibility and Participation

**REFERENCE:** P.L. 105-220 dated August 7, 1998, §101(15)(A)(B)(C), §188(a)(5), §134(d)(4)(B), and 134(d)(4)(E) of the Workforce Investment Act (WIA) of 1998; 20 CFR Part 652, §663.220, 663.230, 663.320, and 664.250 of WIA Final Rules dated August 11, 2000; 29 CFR Part 27 dated November 12, 1999; *WIA Data Validation Application User's Guide* dated August 2004, and U.S. Department of Justice Form I-9, revision dated May 31, 2005.

**BACKGROUND**: Added driver's license as a selection for Citizenship/Alien Status and Right to Work, BUT USING A DRIVER'S LICENSE DOES NOT VERIFY CITIZENSHIP. A driver's license is for identity purposes only. Updated WIA Eligibility & Verification Checklist to line up tables with VOS.

# DEFINITIONS/DOCUMENTATION RELATED TO WIA ELIGIBILITY FAMILY

Under WIA, the term "family" relates to two or more persons living in the same household who are related through blood, marriage, or court decree and are included in at least one of federal law groups A through C below. The **state** further defines family as described in group D below. Family, as defined in groups A through D, must be used in determining financial eligibility **where appropriate** for the three WIA funding streams (Adults, Youth, and Dislocated Workers).

- A. Husband, wife, and their dependent children
- B. A parent or guardian and his/her dependent children
- C. Husband and wife

D. An economic unit of one or more persons who receive at least 50% of their financial support from the economic unit

#### Note:

If any family member included in definitions A-D is disabled, he/she is considered a family of one. Verification of disability must be documented.

#### CITIZENSHIP/RIGHT TO WORK

Participation in WIA Title IB programs or activities must be available to United States citizens, lawfully admitted permanent resident aliens, refugees, asylees, parolees, and other immigrants *authorized to work in the U.S.* There are numerous documents which Local Workforce Investment Agencies (LWIAs) and Administrative Entities (EAs) can accept as verification for citizenship and right to work in the United States. These documents are listed on Attachment B, WIA Eligibility & Verification Checklist, Page 2.

# **SELF-ATTESTATION**

At times and for a variety of reasons, some WIA applicants are unable to provide all of the necessary documents requested of them to complete the process for program eligibility. In these instances, the state does permit Self-Attestation as an alternative means of verifying a *limited number* of factors related to applicant status. Attachment B – WIA Eligibility & Verification Checklist describes those factors for which Self-Attestation is permitted. Attachment A is the Self-Attestation Instructions and form.

# **SELF-SUFFICIENCY**

The use of the term "self-sufficiency" only applies in the context of establishing eligibility for employed adults and employed dislocated workers to receive intensive and training services under WIA, when local area funds are limited.

Self-sufficiency is **not** to be viewed as an outcome measure associated with successful program performance.

The provision of intensive and training services to employed adults and employed dislocated workers is designed to help ensure that these services are provided to workers most in need of them. Under WIA, 100% of the Lower Living Standard Income Level (LLSIL) [annualized level based on family size, as well as metro and non-metro differences] represents a minimum measure of self-sufficiency that each LWIA must use to determine intensive and training service eligibility for employed adults and employed dislocated workers. Local boards may adjust the self-sufficiency level upward from 100% of the LLSIL based on local conditions. Local boards may also opt to define self-sufficiency for employed dislocated workers in relation to a percentage of the lay-off wage.

# COORDINATION OF PELL GRANTS WITH OTHER EDUCATION-RELATED ASSISTANCE

It is important that Local Workforce Investment Areas (LWIAs) leverage available funds for training, including Pell Grants and WIA Individual Training Accounts (ITAs), to ensure that the costs of training and support services are fully paid for WIA participants, and to reduce the likelihood of duplicate payments for such services. To date, the U.S.

Department of Labor has not issued additional guidance regarding the *order of payments* for training costs for individuals eligible for both WIA and other educational assistance. However, the WIA Final Rule does emphasize that local area programs should assist each participant in establishing Pell Grant eligibility before a participant enrolls in a particular school or training program. A WIA participant may be enrolled into training with WIA funds while a Pell Grant application is pending. However, the Local Workforce Investment Area (LWIA)/Nineteen Tribal Nations-Administrative Entities (EA) must put a process in place so that the LWIA/EA can be reimbursed by a training institution for the "tuition" portion of the Pell Grant funds. Generally, Pell Grants provide both tuition and other types of assistance (e.g. living expenses, lab fees, books, etc.). **Only the portion of the Pell Grant that provides for tuition is subject to reimbursement.** 

The Free Application for Federal Student Aid (FAFSA), which is used to establish Pell Grant eligibility, is readily available on-line at <a href="http://www.fafsa.ed.gov">http://www.fafsa.ed.gov</a>. When a WIA participant completes the FAFSA on-line, it can be electronically submitted immediately to the U.S. Department of Education (DOE) for processing. Generally, the DOE makes a determination of Pell eligibility and notifies an applicant within 30 days of FAFSA submittal.

ACTION REQUIRED: (1) Effective April 1, 2006, only the documents listed under "Verification" on the revised WIA Eligibility & Verification Checklist are acceptable verification of the data element. (2) Use Attachment A, Self-Attestation Instructions for completing the Self-Attestation form for those items where self-certification or self-attestation are permitted as verification for WIA eligibility. (3). Use Attachment B, WIA Eligibility & Verification Checklist to determine documents which LWIAs/EAs can accept as verification for WIA eligibility. (4) **DISTRIBUTE** this memo and its attachments to all individuals responsible for WIA eligibility and case management, as well as others who use the Arizona VOS WIA Business Rules and Policies Manual.

If you need additional information, please contact your local State Liaison at (602) 542-3957.

Sincerely,

Lela Alston

**WIA Section Manager** 

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Attachment A: Self-Certification Instructions and Form Attachment B: WIA Eligibility & Verification Checklist

#### **ATTACHMENT A**

#### **SELF-CERTIFICATION INSTRUCTIONS**

The Self-Certification form on the succeeding page is to be used only when all other documented attempts of verification have been exhausted for WIA participant information detailed in Items 1 through 11 below.

NOTE: The Self-Certification form must be signed by a corroborating witness acceptable to the Local Workforce Investment Area, who will attest to the information contained in the Self-Certification form.

## (1) ADDRESS

An applicant statement with a corroborating witness may be used to verify address if no other form of verification is available showing the applicant's address.

### (2) NO ESTABLISHED RESIDENCE - HOMELESS/TRANSIENT

Self-certification is acceptable for verification of homelessness or transience. A homeless or transient individual is an adult or youth who has no street or rural route address, and includes those individuals residing in shelters specifically intended for homeless or transient individuals.

# (3 EDUCATION STATUS AT TIME OF REGISTRATION

An applicant statement or attestation is acceptable verification if no other form of verification is available.

# (4) DISPLACED HOMEMAKER

Self-certification is acceptable verification that an individual is the spouse of someone who has lost their job and the family's source of income.

#### (5) RUNAWAY

Self-certification is acceptable verification if no other form of verification is available.

# (6) OFFENDER

In limited cases an applicant statement is acceptable verification if no other form of verification is available.

### (7) PREGNANT OR PARENTING YOUTH

In limited cases an applicant statement or attestation is acceptable verification if no other form of verification is available.

## (8) SUBSTANCE ABUSE

An applicant statement is acceptable verification if no other form of verification is available.

# (9) FAMILY SIZE

Self-certification is acceptable verification that an individual lives independently, or in a household with one or more additional individuals.

### (10) INDIVIDUAL STATUS/SELF-SUPPORTED

Self-certification is acceptable when an individual claims (a) he/she lives independently and is not dependent upon the income of another person; or (b) the individual, though residing in a household with others, is not dependent upon the income of other residents in the household. In the case of (a) or (b), the individual must produce documentation indicating his/her source of support.

# (11) PROOF OF UNEMPLOYMENT/LACK OF INCOME

Self-certification is acceptable when an individual claims not to have been employed during the six (6)-month period prior to eligibility.

# **Self-Certification Form**

I,, HEI	REBY CERTIFY
I attest that the individual providing the personal in presence.	formation contained in this form did sign the form in my
If individual cannot obtain a satisfactory wi	itness or provide a telephone contact, explain
I attest that the above information is true a above information, if misrepresented or incimmediate termination.	
INDIVIDUAL'S SIGNATURE/DATE	CORROBORATING WITNESS SIGNATURE
WITNESS'S RELATION	ONSHIP TO INDIVIDUAL
	CIAL USE ONLY
The above individual statement is being us	sed to document the following eligibility criteria:
SIGNATURE OF CERTIFYING OFFICIAL	

Family Size  Documentation MUST be in file Disabled (Family of 1) Landlord Statement Lease (if family size is given) Native American Tribal Document Public Assistance/Social Service Agency Records Public Housing Authority (if resident or on waiting list)	Family Size  □ Documentation MUST be in file	VERIFICATION
□ Documentation MUST □ N/A □ Divorce decree □ Disabled (Family of 1) □ Landlord Statement □ Lease (if family size is given) □ Native American Tribal Document □ Public Assistance/Social Service Agency Records □ Public Housing Authority (if resident or on waiting list) □ Written Statement from Publicly Supported 24 Hou Facility □ Social Security Cards/Numbers □ Self Attestation w/witness signature (if no other verification provided) □ Birth Certificates □ Most recent tax return □ Local Area does not verify (No priority of service in effect). □ Birth certificates □ Most recent Tax return □ Local Area dos not verify (no priority of service in effect) □ N/A □ N/A □ Tribal Commodity Program Records/Printout □ Public Assistance Records/Printouts □ Public Assistance Records/Printouts □ Proster Child □ Documentation MUST □ Documentation MUST □ Documentation MUST □ Documentation MUST □ Documentation Form □ Stamped Post Office Receipt of Registration	□ Documentation <u>MUST</u> be in file	IBILITY
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□ Stamped Post Office Receipt of Registration	, .	
		, ,
□ SS Registration Card		
□ SS Advisory Opinion Letter		
□ Selective service registration w/WIA		
□ Not Applicable		
Substance Abuse   Self Attestation	Substance Abuse	
□ Documentation MUST be in file		
□ N/A		
Disabled Veteran   U  VA Certification of Disability		□ VA Certification of Disability
□ Documentation MUST be in file	Decumentation MUST havin file	, i
□ N/A	Documentation <b>MOS1</b> be in the	
		☐ Alien Registration Card (USCIS Forms I-151, I-551,
Documentation <b>MUST</b> be in file I-94, I-688, I-688A, I-688B, I-197, I-179)	□ N/A	,
□ Baptismal Certificate with Place of Birth	□ N/A Citizenship/Alien Registration	
<ul> <li>Original or Certified Copy of Birth Certificate with</li> </ul>	□ N/A Citizenship/Alien Registration	
Official Seal	□ N/A Citizenship/Alien Registration	
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	erification Checklist
ELEMENT	VERIFICATION
Citizenship/Alien Registration - Continued	□ Certificate of U.S. Citizenship (USCIS Form N-560 or N-561)
	□ Certificate of Naturalization (INS form N-550 of N-570)
	USCIS Form I-766
	☐ Driver's license (Identity purposes only)
Dislocated Worker Verification	☐ Cat 1: Separation Notice
Distribution	□ Cat 1: UI Records
	□ Cat 2: WARN notice or letter of authorization from
	the State WIA Admin Dept.  Cat 2: Documentation of "General Announcement."
	<ul><li>Cat 2: Documentation of "General Announcement."</li><li>Cat 3: Receipt of Notice of foreclosure or intent to foreclose.</li></ul>
	□ Cat 3: Proof of failure of the farm, business or
	ranch to return a profit during preceding 12 months.  Cat 3: Entry of individual into bankruptcy
	proceedings.  Cat 3: Inability to make payments on loans secured
	by tangible business assets.
	<ul> <li>Cat 3: Inability to obtain capital necessary to continue operations.</li> </ul>
	☐ Cat 3: A debt-to-asset ratio sufficiently high to be
	indicative of the likely insolvency of the farm, ranch
	or business.
	☐ Cat 3: Other events indicative of the likely
	insolvency of the farm, ranch or business.
	□ Cat 4: Is verified in Barriers - Displaced
	Homemaker
Right To Work	List A
Documentation MUST be in file	<ul><li>U.S. Passport (unexpired or expired)</li></ul>
	<ul> <li>Certificate of U.S. Citizenship (INS Form N-560 or N-561)</li> </ul>
	□ Certificate of Naturalization (INS form N-550 of N-570)
	370)
	□ Unexpired Foreign Passport with I-155 Stamp or Attached I-94 w/valid Employment Authorization
	<ul> <li>Unexpired Foreign Passport with I-155 Stamp or Attached I-94 w/valid Employment Authorization</li> <li>Permanent Resident Card or Alien Registration</li> </ul>
	<ul> <li>Unexpired Foreign Passport with I-155 Stamp or Attached I-94 w/valid Employment Authorization</li> <li>Permanent Resident Card or Alien Registration Receipt Card with Photo (INS Form I-151 or I-551)</li> </ul>
	<ul> <li>Unexpired Foreign Passport with I-155 Stamp or Attached I-94 w/valid Employment Authorization</li> <li>Permanent Resident Card or Alien Registration Receipt Card with Photo (INS Form I-151 or I-551)</li> <li>Unexpired Temporary Resident Card (INS Form I-688)</li> </ul>
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	VEDICATION
ELEMENT	VERIFICATION
Right To Work - continued	contains a photograph or information such as name, date of birth, gender, height, eye color and address  School ID Card with a photograph Voter's Registration Card U.S. Military Card or Draft Record Military Dependent's ID Card U.S. Coast Guard Merchant Mariner Card Native American Tribal Document Driver's license issued by a Canadian Government Authority  For persons under 18 who are unable to present a document listed above: School record or report card Clinic, doctor or Hospital Record Day-care or nursery school record List C  When selecting from list 'C' there must also be a
	<ul> <li>copy of one item from list 'B' as documentation in the participant file.</li> <li>U.S. Social Security Card Issued by the SSA (cannot state "not valid for employment")</li> <li>Certification of Birth Abroad Issued by the Department of State (Form FS-545 or DS-1350)</li> <li>Original or Certified Copy of Birth Certificate with Official Seal</li> <li>Native American tribal document</li> <li>U.S. Citizen ID Card (Form I-197)</li> <li>ID Card for use of Resident Citizen in the U.S. (INS Form I-179)</li> <li>Unexpired Employment Authorization Document issued by DHS (other than those listed under Identity)</li> </ul>
OTH	
Address  Documentation in File  Visually Viewed  N/A	<ul> <li>Applicant Statement with Corroborating Witness</li> <li>Computer Print-out from Government Agency</li> <li>Food Stamp Award Letter</li> <li>Homeless - Primary Nighttime Residence</li> <li>Housing Authority Verification</li> <li>Insurance Policy (Residence &amp; Auto)</li> <li>Landlord Statement</li> <li>Lease</li> <li>Letter from Social Service Agency or School</li> <li>Library Card</li> <li>Local WIA Does Not Verify Address</li> <li>Medicaid/Medicare Card</li> <li>Phone Directory</li> <li>Postmarked Mail Addressed to Applicant</li> <li>Property Tax Record</li> <li>Public Assistance Records</li> <li>Rent Receipt</li> <li>School Identification Card</li> <li>Selective Service Registration Card</li> <li>Utility Bill</li> <li>Voter Registration Card</li> <li>Arizona Driver's License/Arizona State ID</li> </ul>

VVIA Eligibility & VE	
ELEMENT	VERIFICATION  Documentation needs to be current
Pell Grant	
□ Documentation MUST be in file	<ul><li>□ Copy of Check</li><li>□ Letter from School</li></ul>
□ N/A	□ Student Aid Report
	LIDATION
101 Social Security Number	□ DD-214 Report of transfer or discharge
□ Documentation MUST be in File	□ Letter from Social Services Agency
Bocamentation Moor be in the	□ U.S. Passport
	□ Social Security Benefits Letter/Notice
	□ Social Security Card Issued by SSA
	□ Unemployment Insurance Records
	□ Pay stub
	□ W-2
102 Date of Birth & Age Verification	□ Baptismal Record (if Date of Birth is Shown)
<ul><li>Documentation <u>MUST</u> be in File</li></ul>	□ Birth Certificate
	<ul><li>DD-214, Report of Transfer or Discharge Paper</li></ul>
	<ul> <li>Arizona Driver's License/Arizona State ID</li> </ul>
	□ Federal, State or Local Government ID Card
	<ul> <li>Hospital Record of Birth</li> </ul>
	□ Passport
	□ Public Assistance/Social Service Agency Records
	□ School Records/Identification Card
	☐ Tribal Records
404 Disability Ctatus	Work Permit
104 Disability Status	Case Notes regarding an Observable Condition
□ Documentation <u>MUST</u> be in file □ N/A	<ul><li>□ Letter from Drug or Alcohol Rehabilitation Agency</li><li>□ Medical Records</li></ul>
	□ Physician's Statement
	□ Psychiatrist's Statement
	□ Psychologist's Diagnosis
	□ Rehabilitation Evaluation
	□ School Records
	□ Sheltered Workshop Certification
	<ul> <li>Social Security Administration Disability Records</li> </ul>
	□ Social Service Records/Referral
	<ul><li>Veteran's Administration Letter/Records</li></ul>
	<ul> <li>Vocational Rehabilitation Letter</li> </ul>
	□ Workers' Compensation Record
111 Veteran Status	DD-214
<ul><li>Documentation <u>MUST</u> be in file</li></ul>	☐ Cross Match with Veterans Data
□ N/A	☐ Military document (ID, other DD Form) indicating
115 Employment Status at Registration	dependent spouse  Case File Notes Showing Information Collected
Documentation MUST be in file	Case File Notes Showing Information Collected from Registrant at Registration
□ N/A	Pay stub
14/7	□ Self-attestation
118 UI Compensation Programs	☐ UI records (benefit history, wage, record, letter)
□ Documentation <b>MUST</b> be in file	
□ N/A	
119 Income	□ Alimony Agreement
□ Documentation MUST be in file	□ Applicant Statement (limited cases)
□ N/A	<ul> <li>Award Letter from Veterans Administration</li> </ul>
	□ Compensation Award Letter
	□ Court Award Letter
	□ Employer Statement/Contact
	□ Family or Business Financial Records
	□ Housing Authority Verification

WIA Eligibility & Ve	
ELEMENT	VERIFICATION
119 Income - continued	□ Pay Stubs
	□ Pension/Annuity Statement
	□ Public Assistance Records
	<ul> <li>Quarterly Estimated Tax for Self Employed</li> </ul>
	Persons
	□ Social Security Benefits
	□ UI Documents and/or Printout
	□ Local WIA Does Not Verify Income
120 Temporary Assistance to Needy Families	□ Cross-Match with TANF
(TANF)	□ Public Assistance Records/Printout
<ul><li>Documentation <u>MUST</u> be in file</li></ul>	Individual applying must be listed on current grant
□ N/A	or show dates of eligibility for benefits
121 General Assistance	<ul> <li>Authorization to Receive Cash Public Assistance</li> </ul>
<ul><li>Documentation <u>MUST</u> be in file</li></ul>	□ Copy of Public Assistance Check
□ N/A	<ul><li>Medical Card Showing Cash Grant Status</li></ul>
	□ Public Assistance Records/Printout
	□ Statement from Social Services Agency
	□ Cross-Match with Public Assistance Database
	Individual applying must be listed on current grant
	or show dates of eligibility for benefits
121 Refugee Cash Assistance	□ Refugee Assistance Records/Printout
<ul><li>Documentation <u>MUST</u> be in file</li></ul>	<ul><li>Authorization to Receive Cash Public Assistance</li></ul>
□ N/A	□ Copy of Public Assistance Check
	<ul><li>Medical Card Showing Cash Grant Status</li></ul>
	□ Public Assistance Records/Printout
	□ Statement from Social Services Agency
	□ Cross-Match with Public Assistance Database
	□ Agency award letter
121 Supplemental Security Income	□ Authorization to Receive Cash Public Assistance
<ul><li>Documentation <u>MUST</u> be in file</li></ul>	□ Copy of Public Assistance Check
□ N/A	□ Medical Card Showing Cash Grant Status
	□ Public Assistance Records/Printout
	□ Statement from Social Services Agency
404 Bissils and Hamanish an	□ Cross-Match with Public Assistance Database
124 Displaced Homemaker	□ Bank Records
<ul><li>Documentation <u>MUST</u> be in file</li></ul>	□ Court Records
□ N/A	Divorce Papers     Divblin Assistance Paperds/Driets/dt
	Public Assistance Records/Printout     Shave in Levelt Nation
	Spouse's Layoff Notice
	<ul><li>Death certificate (of family member)</li><li>Self Attestation</li></ul>
425 Data of Dialogation	
125 Date of Dislocation  □ Documentation MUST be in file	Notice of Layoff  Public Apparament with Follow up Cross Match
	Public Announcement with Follow-up Cross-Match  with LIL System
□ N/A	with UI System
This is not verified in VOS but it is a data validation	Rapid Response List
	□ Verification from Employer □ Displaced Homemaker
element requirement.  126 Homeless or Runaway Youth	
□ Documentation MUST be in file	<ul><li>Written Statement from a Shelter</li><li>Written Statement from an Individual Providing</li></ul>
□ N/A	Temporary Residence
L 14/73	□ Written Statement from Social Service Agency
	□ Self Attestation
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	erification Checklist
ELEMENT	VERIFICATION
127 Youth Offender	□ Documentation from Juvenile Justice/Criminal
<ul><li>Documentation <u>MUST</u> be in file</li></ul>	Justice System
□ N/A	<ul> <li>Documentation phone call with Juvenile</li> </ul>
	Justice/Criminal Justice Representative
	□ Self Attestation
128 Pregnant or Parenting Youth	□ Child's Baptismal Record
□ Documentation MUST be in file	□ Case Notes regarding an Observable Condition
□ N/A	□ Child's Birth Certificate
	□ Doctor's Note Confirming Pregnancy
	□ School program for pregnant teens
128 Pregnant or Parenting Youth - continued	□ Referrals from official agencies
1201 regnant of Farenting Fouth - continued	□ Statement from Social Services agency
	□ School records
	☐ Hospital record of birth
	□ Medical Records
	Child's SSN
400 March Miles Needle Addition	□ Self Attestation
129 Youth Who Needs Additional Assistance	☐ Case Notes
□ Documentation <u>MUST</u> be in file	□ Individual Service Strategy
□ N/A	□ See Local Area Policy and Plan
	□ State Management Information System
	□ WIA Registration Form
130 Education Status at Time of Registration	□ School Record
<ul><li>Documentation <u>MUST</u> be in file</li></ul>	□ Dropout Letter
□ N/A	□ Attendance
	□ Self Attestation
131 Basic Skills Deficiency	□ Case Notes
<ul><li>Documentation <u>MUST</u> be in file</li></ul>	□ School Records
□ N/A	<ul> <li>Standardized Assessment Test</li> </ul>
621 Type of Recognized Educational/Occupational	□ Case Notes
Certificate/Credential/Diploma/	□ Certificates
Degree Attained	□ Diploma
□ Documentation MUST be in file	<ul> <li>Documentation by Training Institution/Provider</li> </ul>
	□ Transcript
622 Other Reasons for Exit	□ Case Notes
□ Documentation <b>MUST</b> be in file	□ Contact with the Penal System
□ N/A	□ Doctor's Records
	□ Hospital Records
	□ State Management Information System
623 In Post-Secondary Education or Advanced	□ Case Notes
Training in quarter after Exit	□ Certificates
Documentation MUST be in file	□ Diploma
□ N/A	□ Documentation by Training Institution/Provider
	□ Enrollment Form
624 In Post-Secondary Education or Advanced	Case Notes
Training in Third Quarter after Exit	□ Diploma
Documentation MUST be in file	□ Documentation by Training Institution/Provider
	l
673 Attained Secondary School Diploma	□ Diploma
Documentation MUST be in file	GED Service from Cohool
□ N/A	Notice from School
	□ School Record
	□ Transcript

Self Attestation is to be used only when all other documented attempts of verification have been exhausted for the WIA participant information.

#### **Definitions**

For most eligibility elements, the validation instructions provide multiple forms of acceptable source documentation. If the worker collects multiple sources for the same data element and the sources conflict, the most reliable source should be used. For example, for Education Status, copies of records from an educational institution are a **more** reliable source than participant's self-attestation. Workers should use their best judgment when deciding the most reliable source.

Most definitions for a particular source are clear; however, definitions for -- Cross-Match, State Management Information System (MIS), Self-Attestation, and Case Notes are provided below.

- 1. <u>Cross-Match</u>: A cross-match requires workers to find detailed supporting evidence for the data element. An indicator or presence of a SSN in a non-WIA database is not sufficient evidence. For example, TANF participation can be determined by a crossmatch with the state's public assistance database. It is not sufficient to just find that the sampled SSN is present in the public assistance database. Workers must also find, verify and document the dates of participation and services rendered.
- 2. <u>State MIS</u>: Unless otherwise noted, state MIS refers to specific, detailed information that is stored in VOS. An indicator, such as a checkmark on a computer screen alone, is not an acceptable source of documentation. For example, state MIS is acceptable source documentation for date of first training service. To be an acceptable source to validate the date of first training service, VOS should have detailed information about the type of training and the organization that provided the training. This detailed information makes valid source documentation and makes it unnecessary to validate this data element in local offices.
- 3. <u>Self-attestation</u>: Self-attestation occurs when a participant states his or her status for a particular data element, such as pregnant or parenting youth, and then signs and dates a form acknowledging this status. The key elements for self-attestation are: (a) the participant identifying his or her status for permitted elements and (b) signing and dating a form attesting to this self-identification. **Self Attestation is to be used only when all other documented attempts of verification have been exhausted for the WIA participant information.**
- 4. <u>Case Notes</u>: Case notes refer to either paper or online documentation. Case notes are a detailed account of the interaction between the case manager, the WIA participate and partners. This documentation clarifies participate information in further detail and must identify the specific data element being documented, date the information was obtained, and the case manager who obtained the information. Case notes help to support data validation.